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February 13, 2015

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Tsastsin et al.*
11 Cr. 878 (LAK)

Dear Judge Kaplan:

I represent Dmitri Jegorov, a defendant in the above-referenced matter. We are currently scheduled to appear for oral argument with respect to Defendants' motions on February 20, 2015. I am writing with the consent of all parties, including AUSA Sarah Lai, to request an adjournment due to the fact that I will be actually engaged and on trial before the Honorable John Latella in Queens County Supreme Court, in the case of *PSNY v. Jose Martinez-Garcia*, Ind. No.: 334/2014. The trial is anticipated to last through February 27, 2015.

In addition, Defendants' reply to the Government's response to Defendants' motions are currently due February 13, 2015 (one week prior to oral argument). If the Court is inclined to grant the request for an adjournment of oral argument, Defendants Timur Gerassimenko, Konstantin Poltev and Dmitri Jegorov also hereby respectfully request (with the consent of the Government) an extension of time to file their reply until one week prior to the new date set for oral argument. This request is being made because of various scheduling conflicts on the part of defense counsel, who would each benefit from extra time to coordinate their reply and review it with their respective clients prior to filing.

Finally, the Court should be aware that the parties are actively engaged in plea negotiations. An adjournment of oral argument and an extension of time for Defendants' reply would provide all parties the opportunity to continue to work towards a disposition in this matter.

The relief requested herein represents the Defendants' second request collectively. The first request was granted on February 10, 2015. The Court's time and attention are very much appreciated.

Respectfully submitted,

-s-

Anthony Strazza, Esq.

cc: All parties via ECF